

From: [Denise Lopez](#)
To: [St. Amand, Stephen \(DEM\)](#)
Cc: [Delsesto, David \(DEM\)](#); mark.dennen@dem.ri.gov; [Li, Yan \(DEM\)](#); [Bird, Patrick](#)
Subject: Re: [EXTERNAL] : Air Toxic Permit - Medrecycler
Date: Thursday, March 11, 2021 8:59:07 PM
Attachments: [image001.png](#)

Thank you for your response. Being that there was no public comment allowed for the air permit, how can you really trust ANY of the emission limits in even the air permit application when their process has NEVER BEEN TESTED REAL TIME WITH MEDICAL WASTE. If just even one person had done their due diligence with this project you wouldn't be in this position. You can never truly know or test all the possible combinations of medical waste that are coming in and being processed together to even know what emission limits would be for certain combinations. With regards to the solid waste permit, DEM says they STILL don't have all the proper testing protocols in place so how can anyone know with any certainty or say this is "safe" or how this would impact this highly congested area.

I know you will not be able to respond further but would like to leave you with this piece below on pyrolysis. The science is there if you choose to see it, pyrolysis is "unproven, practically implausible , and environmentally unsound" . Every medical professional I have shown their documentation to cannot believe it has gotten this far. I expect you'll be hearing from several in the days ahead.

Thanks for any additional oversight you can provide.
Best Regards,
Denise Lopez

"Historically, [pyrolysis](#) technologies occupied a niche, producing materials with useful chemical functionality from wood, by the continuous *application* of heat. In the 21st century pyrolysis is promoted as an "advanced" technology for the *extraction* of heat from municipal refuse, at the same time as claiming "sustainable" and "efficient" credentials. This paper examines the concept of pyrolysis, and the potential for a phenomenon which demands energy to be considered as something which can be engineered to provide energy. Using literature review and case study methods, along with civil permit applications and experimental results, it shows that a pyrolysis plant for self-sustaining Energy from Waste is thermodynamically unproven, practically implausible, and environmentally unsound. A linkage between widespread commercial failures and a lack of focus on thermodynamic fundamentals is also identified, along with an environment of indifference or ignorance towards energy balances and sustainability when these technologies are presented, assessed and financed. Though proposals to build machines which violate physical laws is not new, in a modern context this phenomenon is found to be stimulated by competitive financial rewards. The situation presents a high risk to investors and has the potential to adversely impact on societal transitions to a more sustainable future."

https://www.sciencedirect.com/science/article/abs/pii/S0921344918304117?fbclid=IwAR3doJ-zHk-EFRuaFXxMOoibHasqXXQxvk9jjVExSILf6Z4Z_YHqpcZWUGI

On Thu, Mar 11, 2021 at 3:47 PM St. Amand, Stephen (DEM) <Stephen.StAmand@dem.ri.gov> wrote:

Hi Denise,

There is not much we can discuss as the Medrecycler Minor Source Permit is under litigation. In previous emails we have touched upon odor issues; Medrecycler is subject to Odors, 250-RICR-120-05-17, which prohibits objectional odors beyond the property line. Air Toxics, 250-RICR-120-05-22, was taken into consideration while reviewing the application. Medrecycler did not meet the applicability for Part 22 as the emissions presented in the application did not exceed the Minimum Quantiles specified in § 22.11.

Thank you,



From: Denise Lopez <denisealopez35@gmail.com>
Sent: Wednesday, March 10, 2021 7:29 PM
To: Dennen, Mark (DEM) <mark.dennen@dem.ri.gov>
Cc: Li, Yan (DEM) <yan.li@dem.ri.gov>; Delsesto, David (DEM) <david.delsesto@dem.ri.gov>
Subject: Re: [EXTERNAL] : Air Toxic Permit - Medrecycler

Thank you.

Dan - Were you in charge of the air permit or Stephen G. St. Amand ?

Was wondering if any consideration had been given to an Air Toxics Permit for the Medrecycler project based on the following (page 15 of DEM Air Toxics doc below) ...

V. Prioritization of Sources for Requiring Air Toxics Operating Permits

2. Consideration of other factors may shift a source to a higher priority position. Such factors include, but are not limited to:

- Neighborhood concern about odors and/or health impacts
- Proximity of the source to other sources emitting air toxics
- Proximity of the source to residential areas, schools, or other sensitive receptors

- Uncertainty about emissions calculations
- Elevated short-term emissions of a substance with a one-hour or 24-hour AAL

<http://www.dem.ri.gov/programs/benviron/air/pdf/airtoxgl.pdf>

NEIT and a daycare / school are right next to the property as well as residential and commercial area. They clearly state in solid waste application there will be an odor as well as unknown health impacts. It's basically in the middle of Kent County.

Thanks in advance,

Denise Lopez

On Wed, Mar 10, 2021 at 6:47 PM Dennen, Mark (DEM) <mark.dennen@dem.ri.gov> wrote:

I believe David Delsesto is the person in charge of their air permit. I will cc him on this message.

Mark M. Dennen, CPG, Supervising Environmental Scientist

Office of Land Revitalization and Sustainable Materials Management

235 Promenade St.

Providence, RI 02865

401-222-2797 **PLEASE NOTE NEW EXTENSION IS 77112**

mark.dennen@dem.ri.gov

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Wednesday, March 10, 2021 6:38 PM

To: Dennen, Mark (DEM) <mark.dennen@dem.ri.gov>

Cc: Li, Yan (DEM) <yan.li@dem.ri.gov>

Subject: Re: [EXTERNAL] : Air Toxic Permit - Medrecycler

Apologies, as I thought everything for the project goes to you both for permit. Please advise where I should send it.

Thank you,

Denise

On Wed, Mar 10, 2021 at 5:33 PM Dennen, Mark (DEM) <mark.dennen@dem.ri.gov> wrote:

Denise,

Did you intend to send this as a comment to us or to the Office of Air Resources?

Mark M. Dennen, CPG, Supervising Environmental Scientist

Office of Land Revitalization and Sustainable Materials Management

235 Promenade St.

Providence, RI 02865

401-222-2797 **PLEASE NOTE NEW EXTENSION IS 77112**

mark.dennen@dem.ri.gov

From: Denise Lopez <denisealopez35@gmail.com>

Sent: Tuesday, March 9, 2021 10:44 PM

To: Dennen, Mark (DEM) <mark.dennen@dem.ri.gov>; Li, Yan (DEM) <yan.li@dem.ri.gov>

Cc: Rep. Caldwell, Justine A. <rep-caldwell@rilegislature.gov>; Rep. Serpa, Patricia A. <rep-serpa@rilegislature.gov>; Coit, Janet (DEM) <janet.coit@dem.ri.gov>; Sen. Valverde, Bridget G. <sen-valverde@rilegislature.gov>; Sen. P. <sen-burke@rilegislature.gov>

Subject: [EXTERNAL] : Air Toxic Permit - Medrecycler

Mark/ Yan,

Has any consideration been given to an Air Toxics Permit for the Medrecycler project based on the following (page 15 of DEM Air Toxics doc below) ...

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2. Consideration of other factors may shift a source to a higher priority position. Such factors include, but are not limited to:

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<http://www.dem.ri.gov/programs/benviron/air/pdf/airtoxgl.pdf>

Thanks in advance,

Denise Lopez